

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

BMW of North Charleston, LLC,) and Riverland, LLC,))) Plaintiffs,))) vs.))) Quality Exteriors Group, LLC;) Donnie Hawkins; and Drucker &) Faulk, LLC,))) Defendants.))	Civil Action No. 2:18-cv-1872-RMG <u>PROPOSED DISCOVERY PLAN BY</u> <u>DEFENDANTS, QUALITY</u> <u>EXTERIORS GROUP, LLC, AND</u> <u>DONNIE HAWKINS</u>
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Pursuant to Rule 26(f)(3), the defendants' proposed discovery plan is as follows:

Discovery Plan

- (A) What changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement of when initial disclosures were made or will be made;**

The parties have agreed to waive Fed.R.Civ.P. 26(a)(1) disclosures.

- (B) The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused on particular issues;**

Discovery should be conducted on the facts alleged by Plaintiff, defenses asserted by Defendants, and issues of alleged damages. The parties have proposed a discovery deadline of May 24, 2019. Furthermore, the parties do not request that discovery should be conducted in phases or be limited to or focused on particular issues.

- (C) Any issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced;**

None at this time.

- (D) Any issues about claims of privilege or of protection as trial-preparation materials, including – if the parties agree on a procedure to assert these claims after production – whether to ask the court to include their agreement in an order;**

None at this time.

(E) What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed; and

The parties do not request any changes at this time.

Any other orders that the court should issue under Rule 26(c) or under Rule 16(b) and (c).

None at this time.

Respectfully submitted,
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September 18, 2018